

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PHILIP FRYMAN, *et al.*,

Plaintiffs,

v.

ATLAS FINANCIAL HOLDINGS, INC.,
SCOTT D. WOLLNEY, and PAUL A.
ROMANO,

Defendants.

Case No. 1:18-cv-01640

Hon. Franklin U. Valderrama
United States District Judge

Hon. Sheila M. Finnegan
United States Magistrate Judge

**PLAINTIFFS' UNOPPOSED MOTION FOR: (I) PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT; (II) CERTIFICATION OF THE SETTLEMENT
CLASS; AND (III) APPROVAL OF NOTICE OF SETTLEMENT**

Court-appointed Lead Plaintiffs Philip Fryman and Aram Hovasapyan and proposed additional named Plaintiff Chuan Ji (collectively “Plaintiffs”) hereby respectfully move the Court for an Order: (i) preliminarily approving the proposed settlement with Defendants Atlas Financial Holdings, Inc., Scott D. Wollney and Paul A. Romano; (ii) certifying a settlement class; (iii) approving the form and method for giving notice to members of the settlement class as provided in the Stipulation and Agreement of Settlement dated November 28, 2022 (“Stipulation”); and (iv) scheduling a final approval hearing for a date at the Court’s convenience. Defendants do not oppose the motion.

This motion is based upon the present Motion, the Stipulation, the supporting Memorandum of Law, the Declaration of Kara M. Wolke, the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice submitted concurrently herewith, and all pleadings, records and papers on file herein.

DATED: December 2, 2022

Respectfully submitted,

GLANCY PRONGAY & MURRAY LLP

By: /s/ Kara M. Wolke

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PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old. On, December 2, 2022, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Northern District of Illinois, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 2, 2022, at Los Angeles, California.

s/ Kara M. Wolke

Kara M. Wolke